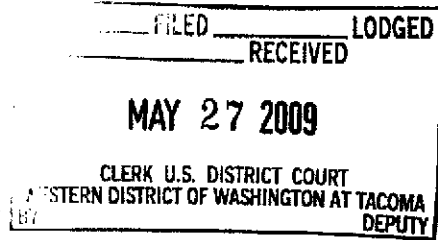


The Honorable J. Richard Creatura



09-MJ-05141-CMP

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

STERLING TERRANCE HOSPEDALES,
Defendant.

CASE NO. MJ 09-5141

COMPLAINT for VIOLATION

Title 18, United States Code,
Section 1591

BEFORE J. RICHARD CREATURA, United States Magistrate Judge, Tacoma,
Washington.

COUNT ONE

(Sex Trafficking of a Child)

During at least April 2009, in Pierce County, within the Western District of Washington, and elsewhere, STERLING TERRANCE HOSPEDALES, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide and obtain by any means, a juvenile female (JF1), who had not attained the age of 18 years old, to cause JF1 to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

COUNT TWO

(Attempted Sex Trafficking of a Child)

During at least April 2009, in Pierce County, within the Western District of Washington, and elsewhere, STERLING TERRANCE HOSPEDALES, did, in and

1 affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide and
2 obtain by any means, a juvenile female (JF2), who had not attained the age of 18 years
3 old, to attempt to cause JF2 to engage in commercial sex acts.

4 All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2),
5 and 1594(a).

6 The undersigned complainant, Ralph Rocco, being duly sworn, further deposes and
7 states as follows:

8 1. I am employed as a Task Force Officer (TFO) with the Federal Bureau of
9 Investigation (FBI) assigned to the Tacoma Resident Agency of the Seattle Field
10 Division. I am also employed as an Investigator with the Lakewood Police Department
11 (LPD). I have been a Task Force Officer for sixteen months and a police officer for nine
12 years. I have investigated numerous cases involving the sexual exploitation of children,
13 including cases involving juveniles being trafficked into prostitution. I have made arrests
14 and conducted searches pertaining to these types of investigations. I have also worked as
15 a member of the Innocence Lost Task Force, which is comprised of members of local
16 state and federal law enforcement communities who are involved in investigating cases
17 involving juvenile prostitution. Based on my training and experience involving
18 prostitution and human trafficking, I am familiar with the general nature and methods of
19 operation of human trafficking and prostitution related criminal enterprises.

20 2. The information contained in this affidavit is based upon my own
21 knowledge, as well as upon court documents, police reports, the investigations conducted
22 by others, and the details related to me by others familiar with this matter. I have
23 included in this affidavit only enough information necessary to establish probable cause
24 to believe that STERLING TERRANCE HOSPEDALES (HOSPEDALES) has
25 committed the crimes of Sex Trafficking of a Child and Attempted Sex Trafficking of a
26 Child involving two juvenile females under the age of 18 years old. I have not included
27 in this affidavit all of the information known to me about this case, but have included
28 only those facts pertinent to establish probable cause for each count charged above.

1 3. On April 13, 2009, Lakewood Police Department (LPD) Detective Ryan
2 Larson was advised by Seattle Police Department Sergeant Ryan Long that a juvenile
3 runaway, hereinafter referred to as "JF1" was believed to be working as a prostitute in the
4 Lakewood area and using the name "Stacy". Sergeant Long emailed Detective Larson a
5 Craigslist advertisement in which JF1 advertised prostitution services in Lakewood under
6 the name of "Stacy." As a result of my training and experience, I am aware that many
7 prostitutes advertise their services over the Internet, often using services such as
8 Craigslist.

9 4. On April 14, 2009, LPD Vice Investigator Officer Brian Danley, using the
10 information provided by Sergeant Long, reviewed a Craigslist advertisement, with full
11 color pictures, for an individual named "Stacy," based in Lakewood. The advertisement
12 listed a telephone number of 206-779-9335 and advertised a rate of "100 hugs hhr" and
13 "150 hugs hr." Based on my training and experience as a vice investigator, I am aware
14 that prostitutes commonly refer to dollars as "hugs" in online advertisements. Based on
15 this information, I have interpreted JF1's advertisement to offer \$100 per half hour sexual
16 session and \$150 per hour sexual session.

17 5. At approximately 12:16 p.m. that day, Officer Danley called JF1 at the
18 phone number (206-779-9335) listed on "Stacy's" Craigslist advertisement. A female
19 answered the phone and identified herself as "Stacy." Officer Danley asked JF1 if she
20 was working and she told him she did not start until 1:00 p.m. Officer Danley then called
21 JF1 back at 1:45 p.m. JF1 said that she was ready to meet him and told Officer Danley to
22 come to the area around Western State Hospital, which is located at 9601 Steilacoom
23 Boulevard SW, in Tacoma, Washington, and to call when he arrived. After arriving in the
24 area, Officer Danley called JF1, who told him that she was locked out of her apartment
25 and would be available in about five minutes.

26 6. At the same time that Officer Danley was arranging this appointment with
27 JF1, LPD Officer Waller also called JF1, using a different phone than the one Officer
28

1 Danley had used and asked if she was working. JF1 told Officer Waller she was at a
2 McDonald's restaurant eating, and she would call him back when she was finished.

3 7. LDP Officers Waller and Estes then went to the McDonald's restaurant
4 located at 8201 Steilacoom Boulevard SW, which is close to the Western State Hospital
5 area where JF1 had directed Officer Danley. As they arrived at the McDonald's, Officer
6 Danley received a call from JF1, who asked if she could send him a text message with the
7 address where he was supposed to meet her. Officer Danley said that was acceptable, and
8 he soon received a text message from JF1 listing "8101 83 Ave SW Lakewood 98498
9 Morning Tree Park Apartments" as the address where he was to meet her. Officer Danley
10 sent JF1 a return text message asking what apartment he should go to, and JF1 replied
11 that she would give him the number when he arrived at the apartment complex.

12 8. While JF1 and Officer Danley were text messaging, Officers Waller and
13 Estes observed two females sitting in the McDonald's at 8201 Steilacoom Boulevard SW.
14 One of the females, who resembled the pictures of "Stacy" that were in the Craigslist
15 advertisement, appeared to be using her cellular telephone to send a text message. Officer
16 Danley then arrived at the McDonald's and approached the two females. Officer Danley
17 confirmed that the cellular telephone being used by the female who appeared to be JF1
18 was the same telephone that had been used to send text messages to Officer Danley to
19 arrange a prostitution deal. Officer Danley then arrested JF1 for soliciting prostitution.

20 9. JF1 subsequently admitted her real identity and it was confirmed that she
21 was 17 years old. Officer Danley verified that JF1 was listed as an endangered missing
22 juvenile (Seattle Police case number 08-298XXX). Both JF1 and her companion,
23 hereinafter referred to as "JF2", who was identified as being only 16 years old, were
24 transported to the Lakewood Police Station to be interviewed by me and Detective
25 Larson. Prior to this interview, Officer Danley advised both JF1 and JF2 of their
26 *Miranda* rights. JF1 and JF2 stated that they understood their rights and agreed to talk to
27 me and Detective Larson.
28

1 10. JF1 and JF2 gave Detective Larson and me permission to look through their
2 respective cellular phones. As Detective Larson began to review the calls on JF2's
3 phone, an individual identified by the caller identification feature as "Mocky," with a
4 telephone number of 786-838-9504, called JF2's number. "Mocky" also left JF2 several
5 texts asking where JF2 and JF1 were. At 3:34 p.m., "Mocky" sent JF2 a text message
6 stating "is [JF1] with u". At 3:50 p.m., "Mocky" sent JF2 another text message stating
7 "Nigga u better call me back where is [JF1]."

8 11. I reviewed JF1's cellular telephone and observed that her contact list
9 included an individual identified as "Sterling," who had the same phone number (786-
10 838-9504) as "Mocky." Upon further review, I saw that "Sterling" had sent numerous text
11 messages to JF1 that afternoon, including the following messages:

- 12 • At 3:18 p.m., "Sterling" sent a text message to JF1 stating "Call me
13 back".
- 14 • At 3:56 p.m., "Sterling" sent a text message to JF1 stating "What ever
15 nigga call me fucking now".
- 16 • At 3:57 p.m., "Sterling" sent a text message to JF1 stating "If I don't
17 hear from u in the next 10 mins we gonna have a problem because I know
18 something aint right".
- 19 • At 3:59p.m., "Sterling" sent a text message to JF1 stating "And where is
20 [JF2] u tell her when I call her ass she better pick the fuck too. So if u
21 cant talk tell [JF2] to call me asap".

22 12. A further review of JF1's text messages indicated that JF1 had sent
23 messages to "Sterling" referring to him as "Daddy." I am aware as a result of my training
24 and experience that "Daddy" is a common term that prostitutes use to refer to their pimp.
25 JF1 had also sent texts to "Sterling" letting him know that she was okay and when she
26 would be "done."

27 13. Based upon my training and experience in working with prostitutes, I am
28 aware that most prostitutes work with someone who is commonly identified as a "pimp."

1 A pimp is a person who manages a prostitute by ensuring that the prostitute is advertising
2 and procuring customers in a fee for sex trade. The pimp is the control element and often
3 demands that a prostitute earn her room, board, and keep by selling herself to repay the
4 pimp for services rendered, such as protection, transportation, and living expenses. Pimps
5 often keep all monies the prostitutes receive for sexual services and any other income of
6 the prostitutes. I am also aware that pimps often use threats and intimidation to coerce
7 prostitutes into working for them and will often physically assault prostitutes who do not
8 follow their orders or who do not service a sufficient number of customers. As a result,
9 many prostitutes are afraid of angering their pimps and will often lie about their identity
10 when asked by law enforcement. Based upon my training and experience, and based
11 upon the frequency and content of the text messages, I reached the conclusion that the
12 individual using the telephone number 786-838-9504 and identified as "Sterling" on
13 JF1's phone and as "Mocky" on JF2's phone was JF1 and JF2's pimp.

14 14. After reviewing these text messages, Detective Larson and I spoke with
15 JF1. We asked JF1 whether the individual identified as "Sterling" on her cellular
16 telephone was her pimp. JF1 admitted to being a prostitute, but initially denied that
17 "Sterling" was her pimp. Instead, she said that "Sterling" was just a friend and that her
18 pimp was someone else. JF1 stated that JF2 was prostituting with her and said that JF2
19 used the name "Ne-Ne" in posted advertisements on Craigslist to solicit prostitution
20 business. A subsequent search of Craigslist uncovered an advertisement that confirmed
21 this statement.

22 15. Detective Larson and I also interviewed JF2. JF2 stated that she had
23 recently driven to the area from Wyoming with a friend and was transient. JF2 denied
24 any involvement with prostitution and stated that "Mocky" was her boyfriend.

25 16. Detective Larson and I then prepared to charge JF1 and JF2 with
26 prostitution and to transport them to be booked into custody at Remann Hall. Upon
27 learning this information, JF1 told Detective Larson and me that she was prepared to tell
28 the truth.

1 17. During a subsequent interview with me and Detective Larson, JF1
2 admitted that the individual identified in her cellular telephone contact list as "Sterling"
3 was STERLING HOSPEDALES, who she claimed was both her pimp and her boyfriend.
4 JF1 stated that she met HOSPEDALES at a friend's house in Seattle and has been
5 working for him as a prostitute for about four and a half months. JF1 stated that
6 HOSPEDALES got her an apartment at 8101 83rd Avenue Southwest, Apartment 35, in
7 Lakewood, Washington to serve as the base for her prostitution activities. JF1 further
8 stated that HOSPEDALES stays at this apartment sometimes, but usually stays in the
9 barracks at Fort Lewis because he is in the military. JF1 stated that HOSPEDALES is
10 aware she is under age 18, and stated he has taken nude pictures of her and posted them
11 on the Internet on various websites, including Craigslist, to advertise her prostitution
12 services.

13 18. JF1 further advised the money she makes from prostitution goes to
14 HOSPEDALES and he keeps it in a drawer in the bedroom at the apartment on 83rd
15 Avenue Southwest. JF1 stated all of her prostitution "calls" are done in the living room
16 of the 83rd Ave Southwest apartment on an air mattress which is set up there. JF1 further
17 stated she keeps condoms, lubrication, and baby wipes in the television stand. Detective
18 Larson asked JF1 approximately how much money she had given to HOSPEDALES in
19 the time she has worked for him, and JF1 estimated she has given him approximately
20 \$5,000 to \$6,000 of her prostitution earnings. JF1 further stated HOSPEDALES has
21 never assaulted or threatened her, and he uses the money she earns to take care of her.
22 JF1 admitted she had worked as a prostitute prior to working for HOSPEDALES, which
23 was how she knew most of the rules associated with prostitution.

24 19. When asked about JF2, JF1 stated she met JF2 through JF2's Internet
25 MySpace page. JF1 said HOSPEDALES had paid for a plane ticket to fly JF2 to Seattle
26 about a week ago. JF1 further stated although she and JF2 had taken nude pictures of
27 each other, and HOSPEDALES had posted them online, JF2 had not worked as a
28 prostitute since coming to Seattle. JF1 said JF2 had sat and watched while JF1 did a few

1 calls, but JF2 wouldn't participate even though the customer had paid for both of them.
2 JF1 said since HOSPEDALES had paid for JF2's plane ticket, he wanted JF2 to work as a
3 prostitute to pay him back. JF1 said HOSPEDALES also told her to try to talk JF2 into
4 prostituting and possibly working with her so she would feel more comfortable. JF1 said
5 she tried doing that, but JF2 still would not engage in any prostitution activities. JF1 said
6 HOSPEDALES was about to kick JF2 out of the apartment because she hadn't earned any
7 money. JF1 further said JF2 posted advertisements on Craigslist using the name
8 "Ne-Ne."

9 20. After talking to JF1, Detective Larson asked JF2 if she was willing to be
10 re-interviewed. JF2 agreed to talk and said that she didn't want to get into trouble for
11 what Mocky, whom she now identified as "Sterling," and JF1 were doing. JF2 stated she
12 had met Sterling and JF1 on MySpace. JF2 further stated that about a week ago, Sterling
13 paid for her to fly from Wyoming to Seattle. JF2 stated she had no idea that Sterling and
14 JF1 were involved in prostitution until she got to Seattle. JF2 stated Sterling picked her
15 up from the airport in Seattle and brought her to the apartment at 83rd Ave Southwest in
16 Lakewood. JF2 soon realized JF1 was prostituting, and Sterling was her pimp. JF2 said
17 Sterling would take pictures of JF1 and post them on the Internet to advertise for
18 prostitution customers. JF1 would then have sex with the men who contacted her.
19 According to JF2, JF1 would either give Sterling the money she earned from prostituting
20 or place the money in a drawer in Sterling's bedroom at the apartment. JF2 stated she had
21 not engaged in prostitution, but she was present on several occasions when JF1 engaged
22 in prostitution. In addition, JF2 said JF1 had taken naked pictures of her. JF2 believed
23 Sterling had posted these pictures on Craigslist, although she wasn't sure. JF2 said that
24 JF1 and Sterling were both constantly harassing her about becoming a prostitute, but that
25 she never did. JF2 said Sterling threatened to kick her out of the apartment and have girls
26 beat her up if she didn't pay him back for the plane ticket by prostituting, but she still
27 refused to engage in prostitution. JF2 said prior to the officers approaching her at
28 McDonald's, she was making plans to get away from Sterling and JF1.

1 21. After speaking to JF1 and JF2, Detective Larson applied for and was
2 granted a warrant to search the apartment located at 8101 83rd Avenue Southwest,
3 Apartment B-35 in Lakewood, Washington. In addition, members of the Lakewood
4 Police Department Special Operations Unit conducted surveillance at the apartment.
5 While conducting surveillance, Officer Danley observed a black 2005 Buick Lancer
6 vehicle bearing Washington State license plate 455-YHP park at the apartment complex.
7 Danley then watched a man walk up to Apartment B- 35 and open the door with a key. A
8 review of Washington State Department of Licensing records revealed this vehicle was
9 registered to an individual named Sterling T. Hospedales.

10 22. Approximately one hour after first arriving at the apartment complex, the
11 male who had entered apartment B-35 reappeared and began walking towards his vehicle.
12 Officer Danley asked the individual if his name was Sterling Hospedales and if he lived
13 in apartment B-35. The male, subsequently identified as HOSPEDALES, replied "yes" to
14 both questions. Officer Danley advised HOSPEDALES that he was under arrest for
15 promoting prostitution and advised him of his *Miranda* rights. During a search of
16 HOSPEDALES's person incident to arrest, officers found an envelope with \$860.00 in
17 cash and JF2's birth certificate in his possession.

18 23. HOSPEDALES stated that he understood his *Miranda* rights and agreed to
19 talk to officers. HOSPEDALES stated that he is an infantry soldier and a sergeant in the
20 United States Army. HOSPEDALES admitted that he knew JF1 and said that she lived
21 with him in his apartment. HOSPEDALES said he knew JF1 was a prostitute, and she
22 did not walk the streets because she worked out of his apartment. HOSPEDALES said
23 JF1 posted advertisements soliciting prostitution on Craigslist, and he admitted he took
24 the pictures of JF1 that were on her Craigslist advertisements.

25 24. HOSPEDALES further admitted he knew JF2, and stated that he had
26 previously met her on MySpace, but they had lost contact. HOSPEDALES said JF2 had
27 recently contacted him and asked for a bus ticket to Seattle from Wyoming.
28 HOSPEDALES said he paid \$350 for a plane ticket and flew JF2 to Seattle. When JF2

1 arrived at the airport, he realized she was not the person he had expected, and he thought
2 he had been talking to a different female who lives in Florida. HOSPEDALES said he
3 nevertheless gave JF2 a ride to his apartment and gave her a place to stay.

4 HOSPEDALES said JF2 posted photographs of herself on Craigslist under the name
5 "Ne-Ne."

6 25. HOSPEDALES admitted JF1 and JF2 would engage in prostitution on the
7 air mattress in the living room of his apartment. He further stated JF1 and JF2 put the
8 money they made from prostitution in a safe in his bedroom. HOSPEDALES said when
9 he did not hear from JF1 and JF2 earlier that day, he thought they had run off with
10 another pimp, so he took the money from the safe so they wouldn't come back and steal it
11 from him. HOSPEDALES admitted the \$860.00 in the envelope that he had on his
12 person at the time of his arrest was the proceeds from JF1's prostitution activities which
13 he had taken from the safe.

14 26. HOSPEDALES further stated that he is the subscriber for the cellular
15 telephone 786-838-9504 (the number that was associated with "Mocky" and "Sterling").
16 He stated that he had provided JF1 with the cellular telephone 206-779-9335 (the number
17 that was listed on "Stacy's" Craigslist advertisement) and JF2 with the cellular telephone
18 253-314-1417. HOSPEDALES stated he had provided JF1 and JF2 with these cellular
19 telephones so he could keep in touch with them and so they would not get in trouble.
20 HOSPEDALES emphasized he would rather have JF1 and JF2 work inside his apartment
21 than be on the streets. However, when they went out the cellular telephones allowed him
22 to stay in contact with them.

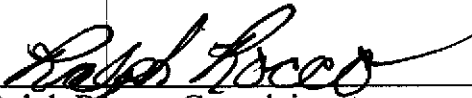
23 27. Upon executing the search warrant of HOSPEDALES's apartment,
24 Detective Larson observed the physical layout of the living room was set up as JF1 and
25 JF2 had described, with an air mattress in the living room. The air mattress and the
26 television stand were the only pieces of furniture in the living room. Officers recovered
27 condoms, lubricant, and wipes from the television stand, as JF1 had described. Officers
28

1 also recovered several items belonging to HOSPEDALES, JF1, and JF2 inside the
 2 apartment and HOSPEDALES's vehicle including, but not limited to the following:

- 3 • A Greyhound identification tag belonging to JF2 that was attached to a
 4 suitcase in the closet of the bedroom;
- 5 • A prescription pill bottle belonging to JF1 in the bathroom;
- 6 • A green, government-issued ledger book that had the name "Hospedales,
 7 Sterling" on the front found in the apartment. The first page of the ledger
 8 contained a series of numbers and abbreviations which I am aware, as a
 9 result of my training and experience, were the standard prices for prostitutes
 10 to advertise on Craigslist;
- 11 • A handwritten note found in HOSPEDALES's vehicle that had flight
 12 information detailing JF2's flight from Wyoming to Seattle. Specifically,
 13 the note stated as follows: "Tue 7th/Cheyenne (1020 hours) to Denver
 14 (1055 hours) Frontier Airlines Flight # 5172/Denver (1220 hours) to San
 15 Francisco (1400 hours) Frontier Airlines flight #657/San Francisco (1817
 16 hours) to Seattle (2018 Hours) United flight #412." I have confirmed that
 17 all the flights listed on this note run daily, and the times listed are exact,
 18 except for the Denver to San Francisco flight, which currently departs
 19 several minutes later.

20 28. Based on my training and experience, I know that the computer is an
 21 instrumentality of interstate commerce, and as such, their use affects interstate commerce.
 22 Craigslist is an Internet web-based advertising business, and the main office for Craigslist
 23 is located in California.

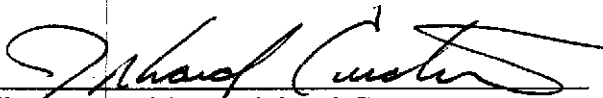
1 29. Based on the foregoing, I submit that there is probable cause to believe that
2 STERLING TERRANCE HOSPEDALES committed the crime of Sex Trafficking of a
3 Child, as charged in Count One above, in violation of Title 18, United States Code,
4 1591(a)(1) and 1591(b)(2), and the crime of Attempted Sex Trafficking of a Child, as
5 charged in Count Two above, in violation of Title 18, United States Code, Sections
6 1591(a)(1), 1591(b)(2), and 1594(a).

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10 Ralph Rocco, Complainant
11 Task Force Officer, Federal Bureau of Investigation

12 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
13 presence, the Court hereby finds that there is probable cause to believe the defendant
14 committed the offense set forth in the Complaint.

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16 Dated this 27 day of May, 2009.

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20 The Honorable J. Richard Creatura
21 United States Magistrate Judge
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